

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-173-01 (WMW/DTS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GOVERNMENT'S MOTION
FOR LIMITED UNSEALING**

ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,

Defendant.

The United States of America, by and through its attorneys, W. Anders Folk, Acting United States Attorney for the District of Minnesota, and Angela Munoz, Emily Polachek, and Laura Provinzino, Assistant United States Attorneys, hereby moves for the limited unsealing of sealed documents filed in support of Defendant Anton Lazzaro's pretrial detention. ECF No. 19.

The parties had an in-person detention hearing on August 24, 2021. Prior to the hearing, the United States filed a Motion for Detention on August 23, 2021. The United States filed it under seal pursuant to 18 U.S.C. § 3509(d) and consistent with Local Rule 49.1(c)(1)(G). In addition to the motion, ECF No. 19, the United States also filed as exhibits (1) a search warrant of the case agent, ECF No. 19-1; (2) a Non-Disclosure / Non-Disparagement Agreement, ECF No. 19-2; and (3) the written submissions in support of detention from the named victims and their family members, ECF No. 19-3.

Given that the hearing lasted after the Court typically closes for the day, the parties did not have an opportunity on the record to address whether the filing should remain under seal and how long the filing should remain under seal. Subsequently, the Honorable Hildy Bowbeer contacted the United States to inquire about whether the motion could be unsealed.

The United States reviewed the filings and consistent with district practice and the law, along with its obligation to protect minor victims and their families in a sex trafficking case where obstruction has occurred, the United States hereby moves for the limited unsealing of its detention filing. With the suggested redactions to ECF Nos. 19, 19-2, and 19-3, the United States moves to unseal those documents. Consistent with district practice, local rules, and the confidentiality and privacy protections of 18 U.S.C. § 3509(d), the United States maintains that the case agent's search warrant, including the affidavit, remain under seal. *See* § 3509(d)(2) ("All papers to be filed in court that disclose the name of or any other information concerning a child shall be filed under seal without necessity of obtaining a court order.")

The United States has consulted with Defendant Anton Lazzaro's counsel, and defense counsel has no objection to the limited unsealing of ECF Nos. 19, 19-2, and 19-3.

Respectfully submitted,

Dated: October 8, 2021

W. ANDERS FOLK
Acting United States Attorney

s/ Laura M. Provinzino
BY: LAURA M. PROVINZINO
Attorney Reg. No. 0329691
ANGELA M. MUNOZ
Attorney Reg. No. 0389207
EMILY A. POLACHEK
Attorney Reg. No. 0390973
Assistant United States Attorneys

United States Attorney's Office
District of Minnesota
300 South Fourth Street, Ste 600
Minneapolis, MN 55415
612-664-5600